

**In the United States District Court  
for the Southern District of Texas  
Houston Division**

**CASANDRA SALCIDO, AS NEXT §  
FRIEND OF MINOR CHILDREN §  
K.L. AND C.L., DENISE COLLINS, §  
KENNETH LUCAS, AMBER §  
LUCAS INDIVIDUALLY AND AS §  
REPRESENTATIVE OF THE §  
ESTATE OF KENNETH §  
CHRISTOPHER LUCAS, §  
DECEASED, AND DEIDRE §  
MCCARTY, AS NEXT FRIEND OF §  
MINOR CHILDREN K.J.L. AND §  
T.J.L., §  
Plaintiffs, §**

**v. §**

**HARRIS COUNTY, TEXAS, §  
DEPUTY DAVID GORDAN, §  
DEPUTY XAVIER §  
LEVINGSTON, DETENTION §  
OFFICER BRODERICK GREEN, §  
DETENTION OFFICER ALICIA §  
SCOTT, DETENTION OFFICER §  
JESSE BELL, DETENTION §  
OFFICER MORRIS THOMAS, §  
AND DETENTION OFFICER §  
ADAM KNEITZ, §  
Defendants. §**

**Civil Action No. 4:15-cv-02155**

**Jury Demand**

**JOINT MOTION FOR ENTRY OF FINAL JUDGMENT**

Plaintiffs and Defendant Harris County file this Joint Motion for Entry of Final Judgment and would respectfully show the Court as follows:

On February 28, 2019, a hearing was held before the Honorable Sim Lake and the parties present announced they had reached a settlement that resolved all claims

asserted by each and every Plaintiff against each and every Defendant. The Court entered an Order approving the settlement as to the Plaintiff Salcido minor children, C.L. and K.L. Doc. 252. All Plaintiffs and Defendant Harris County have entered into a Settlement Agreement and Release that resolves and disposes of all claims that were asserted or could have been asserted by the Plaintiffs against all Defendants in this litigation.<sup>1</sup> Plaintiffs and Harris County request the Court enter the attached Final Judgment disposing of this case.

**Conclusion & Request for Relief**

For the reasons set forth above, Plaintiffs and Harris County respectfully request the Court enter the attached Final Judgment disposing of all claims filed by Plaintiffs against all Defendants.

**Date: March 20, 2019**

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<sup>1</sup> Due to the confidentiality of the minors involved, the Settlement Agreement and Release that sets forth the specific amounts to be paid to them is being filed under seal as an attachment to this Motion. The Final Judgment disposes of all claims against Defendants Harris County, Harris County Sheriff's Office Detention Officers Brodrick Green, Xavier Leveston, Jesse Bell, Adam Kneitz and Morris Thomas, each in their individual capacities, Harris County Sheriff's Office Deputies David Gordon and Alicia Scott k/n/a Riley Scott, each in their individual capacities, Nurse Carrie O'Pry and Dr. Laxman Sunder.

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INDIVIDUALLY AND IN HER  
CAPACITY AS REPRESENTATIVE  
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CHRISTOPHER LUCAS, DECEASED.**

/s/ Laura Beckman Hedge

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**COUNSEL FOR DEFENDANT  
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**Certificate of Service**

I hereby certify that on March 20, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Southern District of Texas, Houston Division, using the electronic case filing system of the Court and served all parties with the foregoing document.

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